

**EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH****Statement On Behalf Of Taylor Wimpey UK Ltd In Respect Of Matter 3 Development Strategy and specifically Spatial Principles 3, 4, 6 and 7**

This Statement is prepared on behalf of Taylor Wimpey UK Ltd who control the land north of Mill Lane, Great Haywood. Representations have previously been made to the Draft Publication version of the Plan in September 2011 and at the pre-Submission stage in February 2013.

This Statement responds to the Inspector's questions on the Spatial Strategy in relation to the Examination of the Local Plan. The key issue is set out as follows:

***Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?***

Specifically in this regard our representations relate to Spatial Principles 3, 4, 6 and 7 and responses to each of the questions raised by the Inspector in relation to each of these policies are set out below. However, we consider that the strategy is fundamentally flawed by a lack of clarity in relation to the role of the Key Serviced Villages ('KSVs') and an over reliance on the role of the surrounding rural areas in meeting housing needs.

**Spatial Principle 3:**

*Does SP3 establish an appropriate, effective, sustainable and soundly based settlement hierarchy, reflecting the existing and future role of settlements, including the County Town of Stafford, Market town of Stone and Key Service Villages, and is this approach fully justified with relevant and up-to-date evidence?*

Policy SP3 sets out the sustainable settlement hierarchy for Stafford Borough, which is utilised in subsequent policies as a guide to direct growth in the most sustainable manner. Please note that we do not object to the general nature of the hierarchy with a focus on Stafford and Stone in their role as the two main urban areas within the Borough.

However, moving beyond this Policy SP3 sets out the KSVs as the last level of the sustainable settlement hierarchy. The villages included as KSVs include Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.

Given the scale of growth envisaged to be directed toward these KSVs (1,200 dwellings) over the Plan period it is considered that the role of these settlements within the sustainable settlement hierarchy is clearly a strategic matter.

Furthermore it is notable in the context of our subsequent representations to Policy SP 4 that no other settlement is appropriate for consideration within the sustainable settlement hierarchy. It is summarised in paragraph 6.38 that, '***...there is a diverse range of other settlements not identified as Key Service Villages across the rural area based on size, level of existing services & facilities,***

*population, accessibility and environmental constraints.* Therefore it can be concluded that there are sound and robust reasons for not directing significant levels of growth to other settlements in the rural area.

In relation to the moratorium, it is considered that this is a relatively blunt instrument and this is particularly the case when it is used at the KSV level. Given that the level of growth is not specified at the settlement-level. Thus, as it currently reads, the moratorium would potentially prevent permissions across all of the KSV if the KSVs as a whole were delivery 25% over that envisaged in the Plan.

The moratorium would therefore prove to be an inflexible tool to deal with the KSVs and, whilst the principles of such a scheme would seem appropriate, it would in practice be unworkable across the rural area and potentially have a significant adverse impact on settlements outside of Stafford and Stone.

#### **Spatial Principle 4:**

*Does SP4 establish an appropriate, effective, justified, sustainable and soundly based distribution of housing growth within Stafford Borough, including the target levels of housing and balance between Stafford (72%; 7,200), Stone (8%; 800), Key Service Villages (12%; 1,200) and other areas (8%; 800)? Is the approach to a moratorium period realistic, appropriate, effective, fully justified and soundly based?*

Policy SP4 uses the sustainable settlement hierarchy to apportion an appropriate level of growth to the different levels of the hierarchy. Significantly at this point the '**Rest of the Rural Area**' is introduced, despite it not appearing on the sustainable settlement hierarchy; with 8% (800 dwellings) of growth apportioned to the rural area.

Consistent with our response to Policy SP3 we do not seek to challenge the level of growth and the role afforded to Stafford and Stone as the two most sustainable locations for growth within the Borough. Therefore we offer no further comment on the 80% of growth for these areas (72% Stafford and 8% Stone) that is suggested in Policy SP4.

However, beyond these two locations there remains 20% of growth (2,000 dwellings) for which we **raise significant concerns. These 2,000 dwellings will impact on 36% of the Borough's population** according to the 2001 Census figures listed under paragraph 6.41 and is clearly a strategic matter for consideration within the Plan for Stafford Borough.

The focus across the Borough is clearly in favour of re-distributing the population of Stafford Borough towards more sustainable locations, demonstrated by Stafford itself having 72% of future growth when it accounted for just **52% of the Borough's** population at the time of the 2001 Census and has accounted for just 48% of growth over the period since 2001. This strategy is broadly supported and is considered to be consistent with national policy. Importantly it is considered that this broad approach is appropriate throughout the sustainable settlement hierarchy and thus should apply equally to the KSVs and the rest of the rural area.

Taking this approach of directing growth to more sustainable settlements, it is considered that the level of growth distributed to the KSVs should be increased and the level distributed to the remainder of the rural area – which contains no settlements which feature in the sustainable settlement hierarchy – be reduced. Increasing the level of growth in the KSVs will help to ensure that these settlements can continue to grow at a sustainable level, retain local services and function as focal hubs for the wider rural area.

In support of this increase in growth for the KSVs we note that of the 1,200 dwellings distributed across the KSVs there have already been 99 completions in the first year of the Plan period and there are 472 commitments already in place (including a 10% discount for non-implementation). Therefore the new provision to be found is just 621 dwellings up to 2031 and an annual build requirement of 58 dwellings per annum, which is roughly half that achieved in the 2011-12 monitoring period.

In this regard there are significant concerns about the ability of this significantly reduced level of growth in enabling the KSVs to maintain their roles through the retention of key services and facilities that they currently have. In securing sustainable growth it is vital that the Council do not neglect both the existing and future residents in the KSVs. Furthermore, there is also the potential for a significant adverse impact on residents neighbouring rural settlements who rely on the KSVs to meet their day-to-day needs.

The Council have proposed to deliver 8% of growth (800 dwellings) across the remainder of the rural area. Of the 800 dwellings distributed across the rural there have already been 143 completions in the first year of the Plan period and there are 360 commitments already in place (including a 10% discount for non-implementation).

Putting this into an appropriate context, the Council are intending to provide 66% of the level of growth attributed to KSVs to settlements which due to a combination of their size, level of existing services & facilities, population, accessibility and/or environmental constraints are not considered appropriate for designation as a KSV. We do not consider this to be a sound or justified approach and suggest that a more robust Plan for Stafford Borough would focus development outside of Stafford and Stone within the KSVs so as to achieve a greater level of sustainability across the rural area of the Borough, with development outside of the KSVs limited to infilling.

Directing such significant levels of growth towards these areas is wholly unsustainable and whilst infilling development may be appropriate an amount of 800 dwellings (just 400 less than the KSVs) is not considered to be justified.

A further weakness of Policy SP4 is that, unlike for Stafford and Stone, the level of growth for each individual KSV is not set out. Given that the overall level of growth directed to the KSVs is of a strategic-level it is appropriate that this matter is dealt with within the Stafford Borough Plan. By including housing requirements for each KSV there would be increased clarity for developers and residents and the Council would be in greater control of directing sustainable growth.

This would also give the Council the opportunity to reflect fully the sustainability of Great Haywood, especially when the proximity of the other KSV at Little Haywood and Colwich is considered.

Furthermore, as Policy SP7 states that appropriate boundaries may be drawn up through Neighbourhood Plans, the lack of a dwelling requirement for each KSV could potentially lead to a situation where the most organised neighbourhood groups could limit the amount of growth to their area by getting in with their Neighbourhood Plan first; this is not compatible with the delivery of sustainable growth across the Borough.

### **Spatial Principle 6:**

*How will SP6 help to achieve rural sustainability, including the re-use of redundant buildings, new employment, public transport and housing mix?*

The principle of achieving rural sustainability as set out in Policy SP6 is supported. Nevertheless, it is vital that any Plan taken forward by the Borough Council is deliverable and the feasibility of sustaining the social and economic fabric of all rural communities should be considered fully.

There are already examples of where services and facilities in rural areas have been eroded and over the Plan period it is considered that the most viable way of preserving as many facilities as possible outside of Stafford and Stone is to focus development within the KSVs and allow them to function as rural hubs. The level of facilities over a broad geographic area that this could achieve is a sustainable and robust strategy for the Council to pursue.

For example, focusing a greater level of development within Great Haywood, Little Haywood and Colwich would be an effective method for ensuring the sustainability of nearby local villages such as Ingestre, Worseley Bridge and isolated rural dwellings nearby.

### **Spatial Principle 7:**

*a. SP7 indicates that one of the key elements to deliver the proposed scale and distribution of housing and employment development is the establishment of Settlement Boundaries for each of the settlements in the Sustainable Settlement Hierarchy, either in this Plan (for Stafford and Stone) or in neighbourhood plans or the Site Allocations & Policies Document (for Key Service Villages). Is this an appropriate, effective, justified and soundly based way of delivering the scale and distribution of proposed development?*

It is stated in Policy SP7 that '*Settlement Boundaries will be established for the Sustainable Settlement Hierarchy defined in Spatial Principle SP3.*' However, it is apparent that at this stage this is relevant only for Stafford and Stone, with the settlement boundaries for the KSVs delayed until the publication of a subsequent site-level Development Plan Document (DPD) or Neighbourhood Plan.

Paragraph 6.64 of the Plan states that, '*Prior to the actual definition being achieved through these processes, the criteria established in the Spatial Principle will be used to judge the acceptability of individual development proposals.*' On this basis it is understood that the settlement boundaries included within the 2001 Local Plan are not being saved.

Given our position set out in response to Policy SP4: that the level of growth being directed towards the KSVs is a strategic matter; that the Council should be seeking to deliver a greater level of development within the KSVs; and that a specific dwelling requirement should be apportioned to each KSV, we consider that the setting of development boundaries for the KSVs is a strategic matter that should be dealt with through the Stafford Borough Plan.

The approach that the Council is taking in delaying the publication of these settlement boundaries will potentially lead to a level of uncertainty for planning in these areas until the relevant DPD or Neighbourhood Plan is can be adopted. As set out in our response to Policy SP4, we are also concerned that the drawing of boundaries through the Neighbourhood Plan process where a dwelling requirement has not been set could potentially lead to growth not being directed in the most sustainable manner.

In the context of Great Haywood, and its potential joint role with Little Haywood and Colwich, it is clearly preferable that the green gap between Great Haywood and Little Haywood is retained so as to protect the local identity of the two areas and also so as to respect the area of historic ridge and furrow identified in this location on the Proposals Map.

Given this, and the tight constraints from the railway line to the west and A51 to the east, it is considered that locating growth on the northern edge of Great Haywood is the most appropriate location for meeting future housing needs in this area. This edge of the settlement is expected to be further reinforced by the route of HS2 in the future, which would provide a robust defensible boundary to growth in this direction.

We consider that the approach that the Council is taking would lead to a period of delay in setting out this guidance; during this delay there is a lack of clarity provided for both developers and residents; and an opportunity to appropriately direct sustainable growth is not being taken by the Council.

*b. Are the criteria for establishing Settlement Boundaries appropriate, justified, effective, soundly based and consistent with national policy?*

The criteria listed for the establishment of settlement boundaries is extensive and broadly consistent with national policy. However, to accord with the NPPF there is a need to balance the social, environmental and economic benefits of future growth. Whilst small-scale development on previously developed land would be consistent with the criteria given under Policy SP7, there is a concern relating to the ability of such sites to viably deliver affordable housing.

This is particularly pressing given that the Council state in Paragraph 3.6 that a reason for Stafford Borough receiving Growth Point status in 2008 was the substantial need for affordable housing. Further to this the Council list the provision of affordable housing as one of their key issues and challenges in Section 4 of the Borough Plan.

Additionally larger sites are more likely to be able to deliver significant contributions to sustain or enhance local services and facilities. Therefore we suggest that the Council should ensure that the wording of this Policy reflects the need to balance the three arms of sustainable growth in KSVs over the Plan period.

*c. Are the criteria set out for considering development in other locations appropriate, justified, effective, soundly based and consistent with Policies E2, E5 & C5 and national policy, including the balance between brownfield and greenfield sites?*

We have no comment to make in relation to the criteria for considering development in other locations further to those comments set out above.